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Civil Engineering

ENVIRONMENTAL INCIDENT  
INVESTIGATION PROCESS



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This instruction implements AFPD 32-70, *Environmental Quality*, and establishes an Environmental Incident Investigation Process for the USAF Academy. The purpose of the Environmental Incident Investigation Process (EIIP) at the Academy is to investigate environmental incidents to determine their primary causes and contributing factors and to identify corrective actions that will prevent future recurrence of similar incidents. The level of investigation required is to be determined by the relative seriousness of an incident.

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**1. Criteria to Trigger the EIIP.** The EIIP will be triggered when an incident occurs that falls into one of the categories identified below. The primary coordinator of the EIIP will be Environmental Flight (510 CES/CEV).

**1.1. Categories.** The following incidents will trigger the Environmental Incident Investigation Process:

- 1.1.1. Category 1. Reportable Quantity Spills or Releases.\*
- 1.1.2. Category 2. Enforcement Action (Notice of Violation (NOV), Fine, or Warning Memorandum).
- 1.1.3. Category 3. Significant Wildlife Violations.
- 1.1.4. Category 4. Illegal Dumping Incidents.
- 1.1.5. Category 5. Incidents not covered in other categories but have the potential to endanger human health and safety or have a significant impact on the environment, or as directed by the ELC Chair or the EIIP Chair.

\* **Note:** Including POL spills greater than 100 gallons.

## **2. The EIIP Organization and Responsibilities:**

**2.1. 10th Air Base Wing Vice Commander (10 ABW/CV) (EIIP Chair).** The 10 ABW/CV will manage the EIIP and serve as EIIP Chair. Responsibilities of the EIIP Chair include the following:

- 2.1.1. Appoint a Team Leader for each incident.
- 2.1.2. Ensure that each incident is properly investigated.
- 2.1.3. Provide guidance to Team Leader as required.
- 2.1.4. Review and validate EIIP Reports.
- 2.1.5. Inform senior management of significant developments relating to EIIP incidents.
- 2.1.6. Ensure corrective actions and preventive measures are implemented.

**2.2. 510 CES/CEV (EIIP Coordinator).** The primary organization responsible for coordinating the EIIP will be 510 CES/CEV. 510 CES/CEV will coordinate all incidents with the EIIP Team, gather initial facts, and initiate the EIIP. To avoid problems associated with bias in the investigation of environmental incidents, 510 CES/CEV's responsibilities in the process will be limited to the initial coordination and closure action after the investigation is complete. 510 CES/CEV responsibilities include the following:

- 2.2.1. Contact EIIP Primary Team and provide the initial briefing to EIIP Chair.
- 2.2.2. Assist the designated EIIP Team Leader during the investigation.
- 2.2.3. Maintain documentation of each environmental incident.
- 2.2.4. Analyze investigation results for use in incident prevention. Develop preventive actions.
- 2.2.5. Ensure investigation results are shared with other organizations to prevent similar occurrences.
- 2.2.6. Follow up to ensure corrective actions and preventive measures are implemented.

**2.3. EIIP Team Leader.** The EIIP Chair will appoint a Team Leader to oversee each investigation. The Team Leader should be appointed from an organization or flight not directly associated with the incident. The Team Leader will be responsible for the following:

- 2.3.1. Assemble investigating Team (Primary and Supporting as required).
- 2.3.2. Direct all investigation actions.
- 2.3.3. Determine the incident category in accordance with this instruction.
- 2.3.4. Conduct initial investigation and collect all pertinent data.
- 2.3.5. Report all milestones to EIIP Chair and ensure all suspenses are met.
- 2.3.6. Coordinate with Staff Judge Advocate (10 ABW/JA) and AFOSI DET 404 (AFOSI).

**2.4. EIIP Primary Team.** The primary EIIP Team will consist of members from 510 CES/CEV, Bioenvironmental Engineering (10 AMS/SGPB), Fire Operations (510 CES/CEF), and Safety (HQ USAFA/SE). EIIP Team member responsibilities include the following:

- 2.4.1. Provide technical support and expertise to the EIIP Team Leader as required.
- 2.4.2. Generate incident investigation report, review corrective actions, and assist in implementation of preventative measures.

**2.5. EIIP Supporting Team.** The supporting team includes 10 ABW/JA, AFOSI, Public Affairs (HQ USAFA/PA) as well as any outside agencies which are participating in the investigation. The supporting team responsibilities include the following:

- 2.5.1. Legal and Office of Special Investigations. The intent of the EIIP is to determine the primary causes of environmental incidents and to identify corrective actions that will prevent future recurrence of similar incidents. It is not a criminal investigation. The Team Leader will coordinate the EIIP with 10 ABW/JA and AFOSI to determine if a criminal investigation is required. Should 10 ABW/JA or AFOSI decide to pursue and prosecute alleged violations, the EIIP will be suspended until 10 ABW/JA or AFOSI determines the EIIP will not interfere with their criminal investigation and evidence.
- 2.5.2. Public Affairs. HQ USAFA/PA involvement will be proactive, emphasizing the maximum disclosure/minimum delay philosophy. HQ USAFA/PA will ensure that all newsworthy information is made publicly available to the maximum extent possible. No information should be held for query only; however, the state and local environmental offices are to be notified prior to releasing information concerning Category 1 or 2 environmental incidents. All environmental incidents which endanger public health or safety or cause substantial environmental damage will be publicly released by HQ USAFA/PA within 1 hour of the incident reported to HQ USAFA/PA by 510 CES/CEV.
- 2.5.3. Other Supporting Team Members. Other supporting team members may include agencies or other organizations within or outside of the Academy. The supporting team may be called upon to provide technical experience to directly support the investigation.

**3. Incident Reporting.** When notified of an environmental incident triggering the EIIP (as outlined in paragraph 1.1), the following actions must take place:

- 3.1. The EIIP Coordinator (510 CES/CEV) contacts the Primary EIIP Team and briefs the EIIP Chair on the details of the incident.
- 3.2. In the case of a substance release, the Environmental Flight will notify all appropriate regulatory agencies as prescribed by law.

3.3. The EIIP Chair appoints a team leader and provides guidance for the investigation.

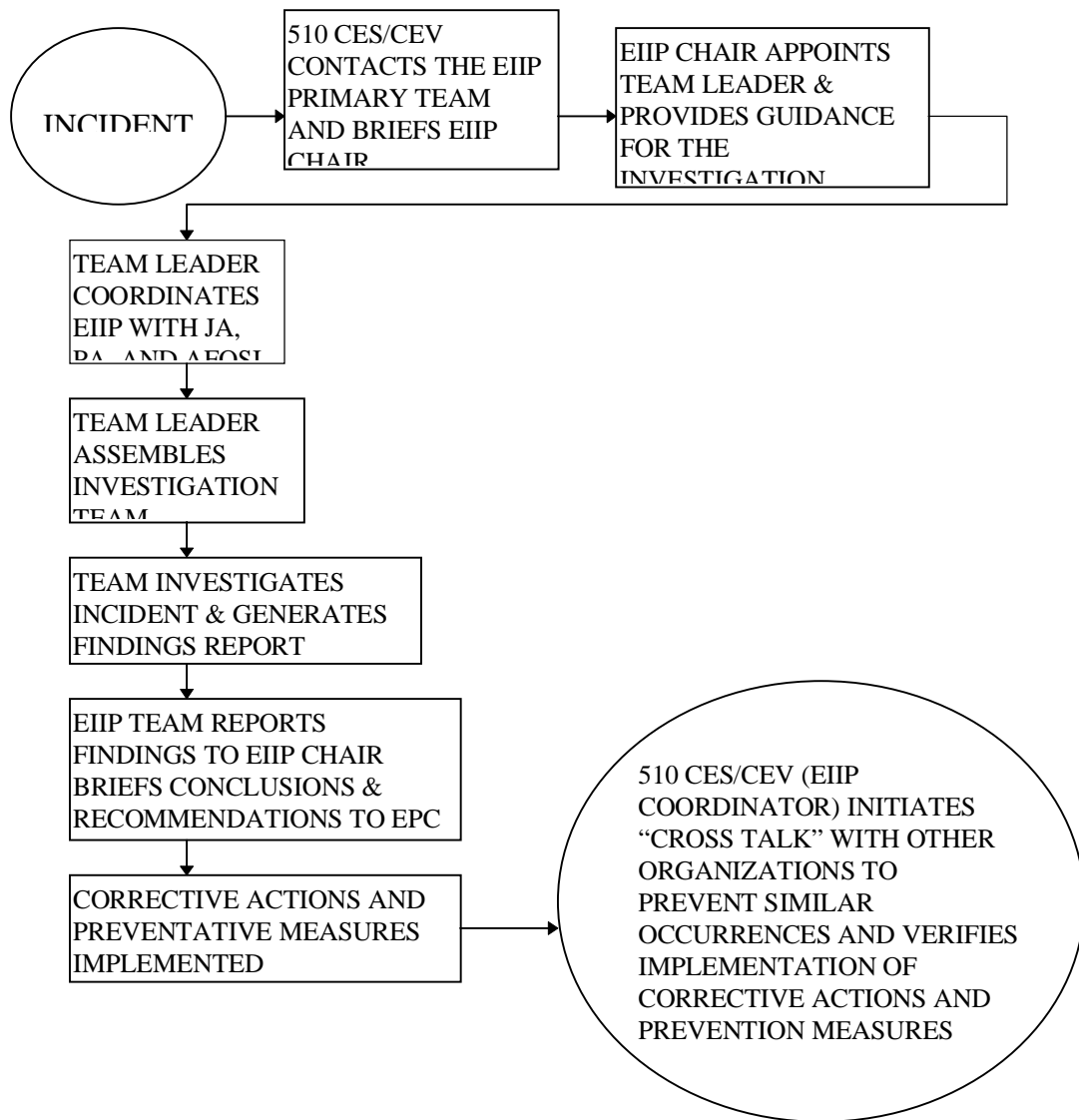
3.4. The EIIP Team Leader will notify AFOSI and 10 ABW/JA immediately.

3.5. The EIIP is followed as outlined in the flow chart ( **Figure 1.**) under paragraph 4..

**4. The Environmental Incident Investigation Process (EIIP).** The flow chart ( **Figure 1.**) outlines the actions that will be taken upon notification of an incident.

**Figure 1. Environmental Incident Flow Chart**

**Figure 1. Environmental Incident Flow Chart**



**5. The Incident Investigation.** The incident should be investigated thoroughly to ascertain the cause of the incident and provide feedback to the EIIP Chair. Investigations must consider all facts before drawing a conclusion on the causes or contributing factors in an environmental incident. The Team must conduct interviews of all affected personnel. (Affected personnel include those involved in the incident and those whose training and experience qualify them as experts.) The board must reconstruct the sequence of events leading to the incident. It must be made clear to the person being interviewed from the onset of the investigation that the EIIP is not a legal investigation, but an investigation to determine the factors leading to an environmental incident to prevent recurrence

**5.1. Investigation Guidelines.** The following guidelines should be followed during an investigation:

5.1.1. Examine the incident site, if applicable. Use of photographs is encouraged to accurately record actual conditions.

5.1.2. Examine all physical evidence and documentation.

5.1.3. The EIIP Chair may request assistance from the 10 ABW/JA and/or AFOSI. If Team members feel that evidence has been discovered that points to possible criminal wrongdoing or legal liability, the 10 ABW/JA/AFOSI team should be consulted without delay. Care should be taken to safeguard all documentation leading to these suspicions to allow the 10 ABW/JA/AFOSI team to evaluate all pertinent evidence. Once the 10 ABW/JA/AFOSI team is brought back into the investigation, the EIIP ceases operations until the legal clearance is obtained.

5.1.4. Examine personnel training and other records to help determine if lack of adequate training contributed to the incident.

5.1.5. Compare interview data, physical evidence, documentation, and records against applicable laws and regulations. Using evidence and professional judgment, determine direct root causes, indirect or contributing factors, and favorable environment leading to the incident.

5.1.6. Identify corrective actions and steps that could be taken to prevent recurrence.

**6. Report/Briefing Preparation.** For each investigation, the EIIP Team will prepare a Findings Report. It is critical to the EIIP that all incident reports be factual and complete. The investigation results are briefed to the EIIP Chair within 14 days after the investigation is concluded. Report of Findings will contain the following:

6.1. A narrative description of the incident. Photographs and site sketches should be included where appropriate. The setting and environment of the incident should be clear from the background information contained within the narrative description.

6.2. The direct root cause of the incident.

6.3. Contributing factors leading to the direct cause of the incident.

6.4. Conclusions of the team. Determine the root causes of the incident that can be eliminated or remedied to prevent future recurrence.

6.5. Recommendations to prevent recurrence at the incident location and Air Force wide.

**7. Report Disclosure.** The EIIP Findings Report is intended to be an internal document. The Report is not intended to be used for criminal investigation. It is recommended that the EIIP Findings Report not be disclosed other than internally unless directed by the EIIP Chair or as advised by 10 ABW/JA.

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